

Attorney Docket No.: FMCE-P078

Remarks

Reconsideration of the above-identified application is respectfully requested.

The present amendment is being submitted in an effort to limit the claims in a manner which the Examiner will find acceptable. The applicants therefore respectfully request that the Examiner enter this amendment and allow the application.

Claims 1 and 7 stand rejected under 35 U.S.C. 102(b) as being anticipated by Logan (U.S. Patent No. 3,063,500). With respect to claim 1, the Examiner asserts that Logan's casing 1 is a debris cap which is pre-charged with oil through connection 25 after installation. However, nowhere does Logan suggest that the casing 1 is connected to an oil-filled container through the connection 25. More likely, the hose 27 leading from the connection 25 extends to a surface facility from which the oil is supplied. Therefore, Logan does not disclose a debris cap which comprises a container that is pre-charged with a corrosion inhibitor prior to installation, as is required by claim 1. Consequently, Logan does not anticipate claim 1.

Nevertheless, the applicants propose to amend claim 1 to further distinguish applicants' invention over Logan. Accordingly, claim 1 now requires that the debris cap be *supported* on the xmas tree or wellhead. Even assuming that Logan's casing 1 is a debris cap, this casing is not supported on the xmas tree 7 or the wellhead 13. Rather, as is clearly shown in Figure 1 of Logan, the

Attorney Docket No.: FMCE-P078

casing 1 is supported by the sea bottom 9. Therefore, Logan does not anticipate claim 1.

Also, since claim 7 depends from claim 1, claim 7 is patentable over Logan for the reasons stated above.

In light of the foregoing, claims 1-9 are submitted as allowable. Favorable action is solicited.

Respectfully submitted,



Henry C. Query, Jr.
Reg. No. 35,650
(630) 260-8093

Date: December 19, 2003